

## **EXHIBIT B**

# SILVER GOLUB & TEITELL LLP

# CLASS ACTION & COMPLEX LITIGATION FIRM RESUME



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Founded in 1978, Silver Golub & Teitell LLP ("SGT") is Connecticut's foremost litigation and trial law firm. SGT's philosophy is simple: To provide clients with the best representation possible, regardless of the effort and expense required.

David S. Golub leads SGT's class action and complex civil litigation practice and has been recognized in "Best Lawyers in America" since 1987. Under Mr. Golub's leadership, the firm's class action and complex litigation practice has recovered billions of dollars in settlements and judgments on behalf of private individuals, corporate whistleblowers, state and local governments, unions, and pensions funds, among others.

For example, in 1994, Mr. Golub represented corporate whistleblowers in a False Claims Act action against United Technologies Corporation which settled for \$150 million, at the time the largest such award ever recovered. From 1996-98, Mr. Golub served as lead private counsel for the State of Connecticut in its action against the tobacco industry, recovering almost \$4 billion for the State. More recently, SGT achieved a settlement of over \$100 million while serving as court-appointed lead counsel for a class of more than 40,000 unionized employees alleging that the firing of over 3,000 union members violated the unions' and its members' First Amendment rights of free speech and free association.



# Our Successes

Silver Golub & Teitell LLP has a fifty-year track record of achieving remarkable results for our clients. Below are some noteworthy examples of our successes.

## *State Employees Bargaining Coalition, et al v. Rowland.*

Following the termination of over 3,000 unionized state employees in November 2002, David S. Golub and Jonathan Levine of SGT served as court-appointed lead counsel for a class of union employees against the State of Connecticut. The plaintiffs alleged that by deliberately singling out union members, the State of Connecticut had violated the unions' and their members' exercise of protected First Amendment rights of free speech and free association, and were ordered with anti-union animus, and in retaliation for the unions' refusal to yield union members' statutorily-protected contract rights.

The State of Connecticut argued that the layoffs were carried out to force the union to agree to concessions that would ultimately save the State money. This argument, however, was rejected by the United States Court of Appeals for the Second Circuit in a precedential decision. The Second Circuit found that the layoffs violated the unions' and union members' First Amendment right to freedom of association. SGT's work achieved a settlement of over \$225 million for a class of more than 40,000 unionized public employees in 2015. The settlement was approved on October 1, 2015.

The case was *State Employees Bargaining Coalition, et al v. Rowland*, No. 03-CV-221 and was brought in the United States District Court for the District of Connecticut before Hon. Alfred C. Covello, Senior United States District Judge.

### ***Spencer, et al v. Hartford Financial Services Group, et al.***

Silver Golub & Teitell was one of three firms appointed that served as lead counsel representing a class of approximately 22,000 owners of structured settlement annuities in a nationwide class action against Hartford Financial Services Group, Inc and its affiliates. Plaintiffs and the class alleged that in order to fund class members' structured settlements, the Hartford property and casualty insurers purchased annuities from their affiliate, Hartford Life. By purchasing the annuity from Hartford Life, The Hartford companies allegedly were able to retain up to 15% of the structured amount of the settlement in the form of undisclosed costs, commissions and profit – all of which was concealed from the settling claimants.

On March 10, 2009 , the U.S. District Court certified claims on behalf of two national subclasses for civil RICO and fraud for trial, and on October 14, 2009, the Second Circuit Court of Appeals denied The Hartford's petition for interlocutory appeal under Federal Rule of Civil Procedure 23(f). On September 21, 2010, the U.S. District Court entered judgment granting final approval of a \$72.5 million cash settlement.

The case was *Spencer v. Hartford Financial Services Group, Inc., No. 05-CV-1681* and was brought in the United States District Court for the District of Connecticut before Hon. Janet C. Hall.

### ***Town of New Hartford, et al v. Connecticut Resources Recovery Authority.***

Silver Golub & Teitell served as court-appointed lead counsel in a certified class action for 70 Connecticut municipalities to recover for losses sustained as a result of a quasi-public trash authority's improper dealings with Enron Corporation. The plaintiffs alleged they suffered damages in the form of increased costs when Enron defaulted on a \$220 million loan made by the Connecticut Resources Recovery Authority ("CRRRA") to Enron.

Plaintiffs' complaint alleged that the CRRRA's loan to Enron was illegal and that the expenditure of funds was an *ultra vires* act on the part of the CRRRA. Plaintiffs further alleged, *inter alia*, that that CRRRA breached a fiduciary duty which it owed to the municipalities, and that CRRRA breached its duty of fair dealing and good faith. SGT's prosecution of the matter on behalf of the class resulted in a judgment of over \$40 million after trial (believed to be largest award ever rendered in Connecticut against a public entity).

The case was *Town of New Hartford, et al v. Connecticut Resources Recovery Authority*, No. UWY-CV-04-0185580S and was brought in Connecticut Superior Court, Judicial District of Waterbury before Hon. Dennis G. Eveleigh.

### ***State of Connecticut v. Philip Morris, Inc., et al.***

David S. Golub of Silver Golub & Teitell served as lead private counsel for the State of Connecticut from 1996-98 in its action against the tobacco industry. Connecticut's action was part of the nationwide litigation which resulted in the November 1998 Master Settlement Agreement ("MSA") for \$246 billion being entered between plaintiffs and the four major tobacco companies Philip Morris USA, R. J. Reynolds, Brown & Williamson Tobacco Corp., and Lorillard.

The terms of the MSA provided for Connecticut to receive \$3.6 billion. Additionally, the leading role of Connecticut's counsel (led by SGT) in the nationwide litigation was specifically recognized by a special panel of former attorneys general, which concluded that the contribution of Connecticut's legal team to the national litigation and settlement was among the top five of the 57 states and other entities involved in the litigation. As a result of that finding, the State received a special award of an additional \$370 million of the national settlement proceeds, bringing the total recovery to nearly \$4 billion.

The case was *State of Connecticut v. Philip Morris, Inc., et al.*, No. X02-CV-960148414S.

### ***United States ex rel. Keeth v. United Technologies Corporation.***

David S. Golub of Silver Golub & Teitell represented the relator in a federal False Claims Act ("FCA") action against United Technologies Corporation which alleged, *inter alia*, that UTC had prematurely billed the government for work not yet performed on a helicopter contract and had inflated material inventories used as a basis for progress bills on its fixed-price contracts. The relator Douglas Keeth also alleged that UTC officials attempted to suppress disclosure of the improper Sikorsky practices after the company discovered and investigated the practices while participating in the Defense Department's voluntary disclosure program.

The *qui tam* litigation resulted in a \$150 million settlement which at the time was the largest ever recovery for an action brought under the FCA. Mr. Golub's client receiving a relator's share of \$22.5 million which was then also the largest such FCA award ever given to a relator.

The case was *United States ex rel. Keeth v. United Technologies Corporation*, No. H-89-323 brought in the United States District Court for the District of Connecticut before Hon. Alan H. Nevas.

### ***Anglim v. Xerox Corporation***

Silver Golub & Teitell served as lead counsel in nationwide class action for 40,000 Xerox pensioners for violations under ERISA, resulting in a settlement that provided increased pension benefits for approximately 40,000 present and former Xerox employees. This was at the time the largest class action in Connecticut history and is still believed to be the largest class action in Connecticut to this day.

The case was *Anglim x. Xerox Corporation*, B-83-2511 and was brought in the United States District Court for the District of Connecticut.

### ***Town of Fairfield v. Madoff***

Silver Golub & Teitell represented the Town of Fairfield, Connecticut and its pension plans from 2008-13 in litigation against several entities that enabled the Town to successfully recover \$15+ million it had invested in Madoff-related investment vehicles.

### ***Izzarelli v. R.J. Reynolds Tobacco Company***

In 2010, David S. Golub obtained a verdict and award of \$28 million for an injured smoker suffering from effects of smoking-related larynx cancer, the first smoker's case to come to trial in Connecticut and the first jury verdict ever returned against a tobacco company in New England history. In 2018 a Federal District Court judge awarded punitive damages and interest, bringing the total judgement to \$52.4 million.

The case was *Izzarelli v. R.J. Reynolds Tobacco Company*, No. 99-CV-2338 and was brought in the United States District Court for the District of Connecticut before Hon. Stefan R. Underhill.



# Pending Matters

Silver Golub & Teitell currently leads the prosecution of class action and complex civil litigation matters against some of the world's largest financial institutions, technology companies, and pharmaceutical manufacturers, including the following representative matters:

## ***Fairfield Retirement System v. Allianz Global Investors, et al***

Silver Golub & Teitell filed a proposed class action on behalf of the Town of Fairfield Retirement System, the New England Health Care Workers Pension Fund, and a class of similarly situated investors against German insurance company Allianz SE and its United States subsidiary, Allianz Global Investors U.S. LLC ("AllianzGI") for, *inter alia*, violations of the Employee Income Security Act of 1974 ("ERISA"), 29 U.S.C. 1001 et seq., breach of contract, and breach of fiduciary duty in connection with the catastrophic losses suffered by investors in AllianzGI's Structured Alpha portfolio of hedge funds. Plaintiffs' complaint alleges that the proposed class lost billions of dollars they had invested in AllianzGI Structured Alpha hedge funds as a result of AllianzGI's abandonment of the funds' investment strategy.

The case is *Retirement Program for Employees of the Town of Fairfield, et al v. Allianz Global Investors U.S. LLC and Allianz SE*, No. 20-cv-5817, and is pending before Hon. Katharine P. Failla in the United States District Court for the Southern District of New York.

## ***In re EpiPen Direct Purchaser Litigation***

SGT is currently part of a committee with court-appointed interim co-lead counsel representing direct purchaser plaintiff drug wholesalers in a proposed class action alleging that Mylan and certain pharmacy benefit managers inflated prices for EpiPen.

The case is *In re EpiPen Direct Purchaser Litigation*, No. 20-CV-00827 and is pending before Hon. Eric. C. Tostrud in the United States District Court for the District of Minnesota.

### ***Zaluda v. Apple Inc.***

Silver Golub & Teitell represents a proposed class of users of Apple Siri-enabled devices in Illinois alleging Apple illegally created, collected, or otherwise obtained and stored their biometric voiceprints without consent in violation of the Illinois Biometric Information Privacy Act ("BIPA"), 740 ILCS/14 *et seq.* The complaint alleges that Apple developed a speaker recognition feature for Siri which enabled Siri to respond only to the voice of the device owner. In doing so, the complaint further alleges, Apple started creating, capturing, or otherwise collecting user's voiceprints through a process Apple refers to as "user enrollment" without obtaining informed consent from Siri users. On December 9, 2020, the Court sustained Plaintiffs' claims and denied Apple's motion to dismiss.

The case is *Zaluda v. Apple Inc.*, No. 2019-CH-11771 and is pending before Hon. Michael T. Mullen of the Circuit Court of Cook County, Illinois, Chancery Division.

### ***Hubbard v. Google, et al***

Silver Golub & Teitell is leading the prosecution of Google LLC ("Google"), YouTube LLC ("YouTube"), as well as children's entertainment companies that operated YouTube channels such as Hasbro, Mattel, Cartoon Network and others in connection with their illegal tracking of the online activity of children under the age of thirteen in violation of the federal Children's Online Privacy Protection Act ("COPPA"), 15 U6501-6506, as well as state consumer protection and privacy laws. Specifically, Plaintiffs allege that Google, YouTube, and the channel owners collected personal identifiers of children YouTube viewers defendants knew to be under the age of thirteen in order .S.C. §§ to target these children with behavioral advertising.

The case is *Hubbard v. Google et al*, No. 19-cv-07016 and is pending before Hon. Beth Labson Freeman in the United States District Court for the Northern District of California, San Jose Division.

### ***Curtis v. Aetna Life Insurance Co.***

SGT represents name plaintiff Dennis E. Curtis in a proposed class action alleging that defendant Aetna Life Insurance Co. ("Aetna") breached its obligations under the Employee Income Retirement Security Act ("ERISA"), 29 U.S.C. § 1001 *et seq.*, to administer Mr. Curtis' and other class members' claims for benefits under their ERISA group medical benefits plans.

The case is *Curtis v. Aetna Life Insurance Co.*, No. 19-CV-01579 and is pending before Hon. Michael P. Shea in the United States District Court for the District of Connecticut.

### ***Thornley v. Clearview AI, Inc.***

SGT filed a proposed class action in Illinois state court against Clearview AI, Inc. ("Clearview AI") in response to Clearview AI's alleged profiteering off Illinois citizens' biometric identifiers in violation of Illinois Biometric Information Privacy Act ("BIPA"), 740 ILCS/14 *et seq.* Specifically, the complaint alleges that Clearview AI secretly compiled a database containing facial geometry scans of over three billion individuals, including citizens of Illinois, and that Clearview AI sold access to this database at a profit to several Illinois entities in violation of BIPA Section 15(c).

After Clearview AI removed the action to federal court, SGT successfully argued, before United States District Court Judge Sharon Coleman, that the action should be remanded to Illinois state court. Judge Coleman remanded the action to Illinois state court on October 23, 2020. Clearview AI appealed Judge Coleman's decision to the United States Court of Appeals for the Seventh Circuit.

The case is *Thornley v. Clearview AI, Inc.*, No. 2020-CH-4348 and is pending in the Circuit Court of Cook County, Illinois, Chancery Division pending Clearview AI's appeal of Judge Coleman's remand decision.

### ***Thornley v. CDW-Government, LLC & Wynndalco Enterprises, LLC***

SGT filed a proposed class action against information technology service and supply vendors CDW-Government, LLC ("CDW-G") and Wynndalco Enterprises, LLC ("Wynndalco") in connection with their roles in procuring licenses for Clearview AI's facial recognition tool and the sale of those licenses for profit within Illinois in violation of, *inter alia*, the Illinois Biometric Information Privacy Act ("BIPA"), Section 15(c) and Illinois' citizens' common law right to privacy.

The complaint alleges that CDW-G contacted Wynndalco and – without disclosing to Wynndalco that the Clearview AI Product involved biometric identifiers and biometric information – entered into an agreement with Wynndalco pursuant to which Wynndalco would purchase the Clearview AI licenses and resell them to CDW-G for a profit. CDW-G then allegedly resold the licenses to the Chicago Police Department. Plaintiffs allege that CDW-G and Wynndalco's actions violate BIPA's prohibition on private entities profiting off of individuals' biometric identifiers.

The case is *Thornley, et al v. CDW-Government, LLC & Wynndalco Enterprises, LLC*, No. 2020-CH-04346 and is pending before Hon. Raymond W. Mitchell of the Circuit Court of Cook County, Illinois, Chancery Division.

## *Diaz v. Griffin Hospital.*

Silver Golub & Teitell represents a court certified class of over 3,100 individuals who were patients of defendant Griffin Hospital from between September 2008 and May 2014 and received insulin administered via multi-dose insulin pens. The certified class alleges that they suffered damages and emotional distress upon learning, via letter, that they had potentially been exposed to blood-borne pathogens as a result of at least eleven Griffin Hospital employees or agents improperly using multi-dose insulin pens.

The complaint alleged that the types of misuse include using a single pen on multiple patients, using a pen prescribed for a specific patient for whom it was not prescribed, drawing insulin from a pen prescribed for a specific patient into a separate syringe and administering the insulin to another patient, or removing the patient identification label affixed to a pen and then administering insulin from the pen to other patients. The court certified the proposed class of individuals on November, 23, 2020.

The case is *Diaz v. Griffin Hospital*, No. UWYCV156029965S and is pending before Hon. Linda Lager of the Connecticut Superior Court, Judicial District of Waterbury.



# Class Action & Complex Litigation Leadership Team

## David S. Golub PARTNER

David S. Golub is an experienced litigator who served as lead private counsel for the State of Connecticut in its action against the tobacco industry. Connecticut's leading role in the nationwide litigation and in achieving the nationwide settlement was specifically recognized by a special panel of former attorneys general, which concluded that the contribution of Connecticut's legal team to the national settlement was among the top five of the 57 states and other entities involved in that litigation. Connecticut stands to recover nearly \$4 billion as a result of its team's legal efforts.



Mr. Golub has also successfully represented corporate whistleblowers in actions brought on behalf of the United States government under the False Claims Act. His \$150 million settlement in 1994 of a claim against United Technologies Corporation was, at the time, the largest such award ever recovered for the United States government under the Act. Mr. Golub's client received a relator's share of \$22.5 million, then also the largest such award ever given to a relator under the Act.

In December 1987 he received the National Legal Aid and Defender Association's annual award for outstanding volunteer contributions by a private attorney to legal assistance for the poor. He has also been active in constitutional and civil rights litigation.

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# Steven L. Bloch

## PARTNER

Steven L. Bloch joined the firm in 2018 with more than 20 years of experience in the litigation of complex class, group and direct actions involving insurance and financial products and services, consumer fraud, employee and health benefits, antitrust and securities. In addition, he has a wide range of complex commercial litigation experience, including corporate disputes, civil RICO, business torts, real estate, banking and credit card transactions, and labor and employment.



Mr. Bloch's experience includes successfully representing a certified class of 22,000 owners of structured settlement annuities asserting RICO and fraud claims against The Hartford Financial Services Group, Inc. and its affiliates resulting in a \$72.5 million settlement, a certified class of collateralized debt obligation ("CDO") investors in an action against Goldman, Sachs & Co. which resulted in a \$27.5 million settlement, and a certified class of policyholders against Nationwide Mutual Insurance Company arising out of Nationwide's failure to offer policyholders the ability to purchase statutorily-required optional levels of underinsured ("UIM") and uninsured ("UM") motorist coverage under automobile insurance policies, resulting in a \$75 million settlement.

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# Ian W. Sloss

## ASSOCIATE

Ian W. Sloss joined the firm in 2019 from a boutique antitrust, consumer protection, and securities litigation firm headquartered in New York. Mr. Sloss' experience includes several class actions involving the manipulation of IBOR-denominated financial instruments as sole or co-lead counsel. *See, e.g., Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-03419 (S.D.N.Y.); *Sullivan v. Barclays PLC*, Case No. 13-cv-02811 (S.D.N.Y.); *In re: London Silver Fixing Ltd. Antitrust Litigation*, No. 14-md-02573 (S.D.N.Y.); *Sonterra Capital Master Fund Ltd. v. Credit Suisse Group AG*, No. 15-cv-871 (S.D.N.Y.). Collectively these actions have resulted in over \$800 million in settlements.



Mr. Sloss has also represented investors in class actions concerning conspiracies by large banks to fix the prices of bonds issued by governmental entities. *See, e.g., In re European Government Bonds Antitrust Litigation*, No. 1:19-CV-02601 (S.D.N.Y.), seeking recovery for U.S. investors in euro-denominated bonds issued by eurozone governments.

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